

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: LIQUID ALUMINUM SULFATE
ANTITRUST LITIGATION

Civil Action No. 16-md-2687
(MCA)(MAH)

MDL No. 2687

Motion Date: April 5, 2021

**DEFENDANTS' MOTION TO ENFORCE SETTLEMENTS AND
JUDGMENT ORDERS**

PLEASE TAKE NOTICE that on April 5, 2021, at 10:00 a.m., or at such other date and time as may be set by the Court, Defendants American Securities, LLC, C&S Chemicals, Inc. and USALCO, LLC (collectively, the “Settling Defendants”), by their undersigned counsel, will move before the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Courtroom 4A, Newark, New Jersey 07101, for an Order enforcing the Settlement Agreements and enjoining Relator from pursuing his lawsuits in Illinois and Virginia.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion, the Settling Defendants will rely on the accompanying Memorandum of Law, exhibits thereto, and all pleadings and proceedings on file.

PLEASE TAKE FURTHER NOTICE that a Proposed Order granting this Motion is being submitted herewith.

PLEASE TAKE FURTHER NOTICE that the Settling Defendants hereby
request oral argument.

Dated: December 11, 2020 American Securities, LLC

By: /s/ C. Scott Lent
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- and -

C&S Chemicals, Inc.

By: /s/ John D. Dalbey
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USALCO, LLC

By: /s/ Aaron L. Casagrande

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